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Letter from Mayor Eric Garcetti

Dear City colleagues:

As my time as your Mayor comes to an end, I reflect on some of my proudest moments. One of these moments was the signing of Executive Directive 32 (ED 32) in late 2021, which cemented my Administration’s commitment to strengthening access to city services for all Angelenos.

As a city of belonging, we know that to truly welcome and include our immigrant and refugee Angelenos, we must all be able to connect. Having the ability to respond to the needs and requests of our immigrant and refugee non-English speaking or English language learner (ELL) neighbors is critical. Having the ability to proactively reach ELL communities when doing education and outreach on city services and programs, especially during moments of crisis, is vital.

ED 32 provides a framework for the City of Los Angeles, particularly City Departments, to succeed in their efforts to provide meaningful access and, ultimately, provide high-quality services. A key piece mandated by ED 32 is the Citywide Language Access Plan, which lays out the City’s policy on language access as well as guidance for City Departments on the creation or updating of their individualized language access plans.

Here, in the City of Los Angeles, we do not shy away from hard work. In the process of doing this important work of revitalizing language access policy, we grew excited by the new territory and humbled by its challenges. I am confident that future administrations will continue to expand this important vision for greater accessibility and strengthen a robust language access program for all Angelenos.

Language is central to connecting and only through connection will we build a prosperous future together.

Eric Garcetti
Your Mayor
1. Introduction: Purpose & Background

Los Angeles is a place of belonging — where people from every corner of the world are welcome to chase dreams, raise families, and make a positive contribution to the life and history of our city. One of the defining markers of our diversity is the sheer number of languages spoken in the Los Angeles area and the benefits and challenges that come with promoting and advancing the economic, cultural, social, and political well-being of multilingual immigrant and refugee communities.

The City of Los Angeles is home to 1,449,999 foreign-born individuals, and among those 5 years of age and over, 58.7% speak English less than “very well.” Individuals who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English are herein referred to as English language learners (ELL). The City of Los Angeles commits to strengthening language access to ensure the full inclusion and belonging of our ELL communities who represent languages from all over the world. In order to do so, a robust language access program is necessary to ensure that the City implements best practices and processes to provide quality, meaningful access to all our programs and services.

On December 16, 2021, Mayor Eric Garcetti signed Executive Directive 32 (ED 32), calling for the creation of foundational policy to strengthen the City’s language access program and ensure meaningful access to programs and services for ELL constituents. This policy, the Citywide Language Access Plan (LAP) for Fiscal Years 2022-2024, establishes the City of Los Angeles’ language access policy, which will be updated as necessary, and at a minimum, biennially, starting with the first update by June 30, 2024. All updates to the LAP shall be made available to the public. Additionally, ED 32 calls on City Departments to create their individualized Department Language Access Plan and states that this document, the LAP, shall serve as a model and guide. In accordance with ED 32, Departments must provide timely, meaningful access for ELL constituents to programs, services, information, and civic participatory processes.

The LAP is designed to create uniformity in the provision of meaningful access at a citywide level and to provide guidance to Departments in creating or updating their individualized Department Language Access Plans, as well as in designing future budget requests to ensure LAP compliance.

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2. Definitions

In order to ensure that City staff have a shared vocabulary when discussing language access, a few commonly used terms and their definitions are provided here.

a. Limited English proficient (LEP): Individuals who do not speak English as their primary language and who have limited ability to read, speak, write, or understand English. LEP individuals may be competent in English for certain types of communication (e.g., speaking or understanding), but still be LEP for other purposes (e.g., reading or writing). In the LAP, the term LEP will be used when referencing official and legal authorities such as U.S Census data, federal and state policies, and other legal mandates. The U.S. Census Bureau identifies an LEP person as anyone above the age of five who reported speaking English less than “very well.”

b. English language learner (ELL): A constituent whose dominant language is not English. Advocates in the language access and language justice movements have criticized the term “LEP” for reinforcing a deficit view of those who are not fluent in English. ED 32 and this LAP adopt ELL as a positive, asset-based view of Los Angeles’ linguistically diverse constituency. The terms “non-English speaking,” “non-dominant language users” or “linguistically marginalized person/communities,” may also be used in other sources.

c. Constituent: A person that resides in the City of Los Angeles. In limited circumstances, a constituent may also be a visitor who is attempting to access City of Los Angeles programs or services that may be available to them, for example at the Los Angeles World Airports or the Los Angeles Zoo.

d. Community-based organization (CBO): Any locally-based community organization that serves City of Los Angeles constituents.

e. Meaningful access: Meaningful access means that a constituent:
   i. Is given adequate information;
   ii. Can understand the services and benefits available;
   iii. Can receive the services for which they are eligible; and
   iv. Can communicate the relevant circumstances of their situation.

f. Primary language: An individual’s primary language is the language in which an individual most effectively communicates.

g. Indigenous language: A language that is native to a region and spoken by indigenous people of the same cultural value and belief. This can include but is not limited to languages from North, Central, and South America, Africa, and Asia. Many of these languages have limited or no written components.

h. Linguistic variant: A form or variance of a language spoken by members of a specific regional or social group which often may only be understood by members of that group. Many Indigenous languages have linguistic variants that are not understood by members outside of their regional or social group, even within the same broader language category. Linguistic variant is a preferred term to its synonym “dialect,” as the use of the Spanish term “dialecto” has been used to denigrate Mexican and Central American Indigenous languages.

i. Sign language: A system of communication using visual gestures and signs, used by deaf and hard of hearing people. With signing, the brain processes linguistic information through the eyes. The shape, placement, and movement of the hands, as well as facial
expressions and body movements, all play important parts in conveying information. There are about 300 different sign languages all over the world and International Sign Language is used outside geographic boundaries.

j. **American Sign Language (ASL):** The predominant visual language used by people who are deaf or hard of hearing in the United States. ASL has its own grammar and syntax rules. Not all deaf or hard of hearing constituents may speak ASL.

k. **Video remote interpreting (VRI):** A method of sign language interpreting that allows people who are deaf or hard of hearing to communicate with a hearing person at the same site via videoconferencing instead of live, on-site interpreting. VRI is also used in a similar way for spoken language as indicated in the definition of interpretation provided in this section.

l. **Translation:** The conversion of written text from one language into another.

m. **Interpretation:** The rendering of a message from one language into another using spoken or sign language without adding, deleting, or changing the content of the message. Interpreting modalities are:
   i. On-site/in-person interpreting
   ii. Over-the-phone interpreting (OPI)
   iii. Video remote interpreting (VRI)

n. **Consecutive interpretation:** A mode of interpretation where one person speaks and then pauses for an interpreter to repeat what has been said in the other language. No equipment is required, however, it is important to account for the longer time that consecutive interpretation takes due to the pauses in between speakers and interpretation.

o. **Simultaneous interpretation:** A mode of interpretation where an interpreter repeats what is said in another language a few seconds after the speaker, requiring them to listen and speak at the same time. This method usually requires special equipment that includes a transmitter, microphone, receivers, and earphones for in-person interpretation. Many telecommunications platforms also have the ability to enable this kind of interpretation, also known as remote simultaneous interpretation (RSI).

p. **Sight translation:** A mode of interpretation where there is an oral rendering of written text into spoken language by an interpreter without change in meaning based on a visual review of the original text or document. Depending on the complexity, not all documents can be sight translated by an interpreter without prior notice and may instead require translation in order to make them accessible to ELL constituents.

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Implementation of the LAP ensures the City of Los Angeles’ continued compliance with federal, state, and local laws and policies. These laws and policies, as well as the guidelines identified in this LAP, are essential to the success of our language access program, and also for preventing unlawful discrimination against our ELL constituency.

Federal

Title VI of the Civil Rights Act of 1964\(^2\) prohibits discrimination on the basis of race, color, or national origin, including limited English proficiency. This law requires recipients of federal financial assistance to take reasonable steps to make their programs, services, and activities accessible to eligible persons with limited English proficiency.

On August 11, 2000, President Bill Clinton signed Executive Order 13166, “Improving Access to Services of Persons with Limited English Proficiency\(^3\),” providing further guidance for compliance with Title VI of the Civil Rights Act for federal agencies and state and local recipients of federal funds. Executive Order 13166 states that persons with limited English proficiency must be afforded a meaningful opportunity to participate in programs that receive federal funds. As such, policies and practices may not deny or have the effect of denying persons with limited English proficiency equal access to federally-funded programs for which such persons qualify. Additionally, if a city agency receives federal funds for a specific program, the entire city agency must meet federal requirements related to language access, not just the recipient program. Similarly, if a city agency receives federal funds for any program, the city, in this case, the City of Los Angeles, must meet federal requirements related to language access, not just the recipient city agency.

State

California Government Code, Article 9.5 Discrimination Section 11135 (a) is a state law that requires certain agencies to provide language access services.\(^4\) This law prohibits discrimination on the basis of sex, race, color, religion, ancestry, national origin, ethnic group identification, age, mental disability, physical disability, medical condition, genetic information, marital status, or sexual orientation, under any program that is “conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any

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financial assistance from the state.” California Code of Regulations Title 22 section 98210(b) defines the term, “ethnic group identification” to mean “the possession of the racial, cultural or linguistic characteristics common to a racial, cultural, or ethnic group or the country or ethnic group from which the person or his or her forebears originated.”

Furthermore, the Dymally-Alatorre Bilingual Services Act of 1973 requires state and local agencies to provide language access services to limited English-proficient speakers and make the public aware of the availability of such services.

Local

On December 16, 2021, Mayor Eric Garcetti signed Executive Directive 32 (ED 32): Strengthening Language Access in the City of Los Angeles, calling for the creation of this LAP and the establishment of a Citywide Language Access Coordinator (Coordinator) to lead the City’s language access program and to support Departments in creating their individualized Department Language Access Plans. ED 32 includes requirements for Departments to report relevant language access data to the Coordinator (see Section 14 “Annual Reporting”) and designate a Department Language Access Liaison to work directly with the Coordinator and be part of the Language Access Working Group formalized under ED 32.

This LAP and related efforts also advance the goals of Executive Directive 20 (ED 20), which ensures “equal access to facilities, services, and programs without regard to any person’s citizenship or immigration status to the maximum extent that the law permits.” Additionally, this LAP reflects the commitments made by the City in a November 8, 2019 resolution declaring the City of Los Angeles a Welcome City and affirming support in the resettling of refugees no matter their race, religion, gender, gender identity, sexual orientation, nationality or country of origin.

Following the guidelines in this LAP is essential to the success of our City’s mission of creating a welcoming environment for all ELL immigrant communities and complying with the aforementioned laws and mandates.

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5 California Government Code, Article 9.5 Discrimination, Section 11135 (a). https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=GOV&division=3.&title=2.&part =1.&chapter=1.&article=9.5.
4. Key Roles for Citywide LAP Implementation

The following roles are key to supporting the implementation, assessment, and updates of the LAP and, more broadly, to supporting the strengthening of the City’s language access program.

The Citywide Language Access Coordinator (Coordinator)

a. Leads the citywide language access program by overseeing the implementation, assessment, and updating of this LAP and supporting the City in responding to emerging citywide language access needs.

b. Works directly with Departments, via General Managers, Heads of Departments/offices, and/or Language Access Liaisons, to collect relevant language access data outlined in Section 13 “Tracking of Language Services” and Section 14 “Annual Reporting,” in order to make pertinent updates to this LAP and advise on language access services budgeting.

c. Serves as the subject matter expert who advises the Mayor, City Council, and Departments, along with the City Attorney’s Office, on supporting compliance with federal, state, and local language access laws and policies.

d. Advises on the existing City-provided language access resources available to Angelenos and any emerging needs, including, but not limited to, additional resources or staffing to support this role.

e. Informs City staff, management, and elected officials about the issues ELL constituents face in accessing City services through information gathered in the Language Access Working Group, described in this LAP, and through the provision of direct, technical assistance to Departments.

f. Works in collaboration with Departments to develop an efficient procurement system that assists Departments’ language access operations, including translation, interpretation, transcription, training, and language proficiency assessments.

g. Works alongside other staff assigned to the language access program to direct the program and its operations, including trainings for Department staff.

h. Performs other duties as assigned.

Functions and Duties of Additional Language Access Staff

The citywide language access program will be led by the Coordinator and staffed according to budget allocations. Together, the Coordinator and supporting staff will:

a. Work to ensure Departments have the technical assistance necessary to create, implement, and update their Department Language Access Plan.

b. Support compliance with federal, state, and local language access laws and policies.

c. Develop and maintain relationships with CBOs, private partners, including philanthropy, and other governmental partners, in order to share best practices and lessons learned, and to create better alignment of language access services among common constituencies.

d. Will consult with the City of Los Angeles Department on Disability to ensure that relevant accessibility best practices and models are adopted in the strengthening of the citywide

language access program and related efforts around language access, and that sign
language and captioning are appropriately embedded in the citywide language access
program through interpreters and video remote interpreting (VRI).

e. When necessary, support in addressing any language access-related complaints
received by Departments, recruiting the support of the City Attorney’s Office, as needed.

**Department Language Access Liaison (Language Access Liaison)**

a. All Departments shall designate a Language Access Liaison to serve as the link between
the Coordinator and additional language access staff and the Department on language
access matters. The Coordinator shall be notified of that person’s name and contact
information (including when there is a subsequent personnel change or change to that
person’s contact information). The Language Access Liaison shall work with the
Coordinator in the collection of all relevant information, including the annual Department
Language Access Report outlined in Section 14 “Annual Reporting” and updates to their
Department’s Language Access Plan, as outlined in Section 12 “Department Language
Access Plan.”

b. The Language Access Liaison shall attend and actively engage in the Working Group
meetings.

**Citywide Language Access Working Group (LAWG)**

LAWG will be led by the Coordinator, will meet regularly, and shall be attended by the
Department Language Access Liaison from each Department to focus on improving access to
City information, programs, and services for ELL Angelenos through the sharing of resources,
best practices, and recommendations to strengthen the City’s language access program,
including discussing updates to the Citywide and Department language access plans.

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5. Threshold & Emergency Response Languages

In recognizing the City of Los Angeles’ linguistic diversity, it is important that Departments work to expand the availability of services that meet the needs of the City’s ELL constituency. This LAP establishes threshold languages that were identified using a combination of data sources, including the American Community Survey (ACS), Los Angeles Unified School District, California Department of Education, Los Angeles City Planning Department, and CBOs. Updates to this threshold list will be made as necessary, and at a minimum, every two years as new data is made available reflecting ELL population changes. The threshold languages, in order of increasing to decreasing prevalence for the City of Los Angeles, are:

Table 1: City of Los Angeles Threshold Languages for FY 22-24

| Tier 1 | 1. Spanish  
2. Korean  
3. Armenian  
4. Chinese  
5. Filipino/Tagalog  
6. Farsi (Persian) | For these languages, must:  
● Provide visible, in-person and online translated written notice of the person’s right to language access services.  
● Be responsive to ELL requests for language access.  
● Provide translation for all vital documents.  
● Ensure targeted outreach of services, programs, and events.  
● Be prepared to provide interpretation in these languages at all public events, in response to advance requests submitted.  
● Procure vendors who can provide services in these languages.  
● Prioritize the hiring of bilingual/multilingual staff in these languages. |
| Tier 2 | 7. Russian  
8. Vietnamese  
9. Japanese  
10. Thai | For these languages, must:  
● Provide visible, in-person and online translated written notice of the person’s right to language access services.  
● Be responsive to ELL requests for language access.  
● Procure vendors who can provide services in these languages. |

There are two primary Chinese writing systems: Traditional and Simplified Chinese. The two systems are mutually intelligible. Prioritizing translation into Traditional Chinese for written materials is recommended. For oral interpretation, Cantonese is recommended as priority, but Departments should conduct a regional and service population analysis to assess when Mandarin is needed.
| Tier 3 | 11. Arabic  
12. Hindi  
13. Bengali  
14. Khmer/Cambodian |
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<tbody>
<tr>
<td>For these languages, must:</td>
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<tr>
<td>• Provide visible, in-person and online translated written notice of the person’s right to language access services.</td>
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<tr>
<td>• Be responsive to ELL requests for language access.</td>
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<tr>
<td>• Procure vendors who can provide services in these languages.</td>
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<tr>
<td>For these languages, consider:</td>
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<tr>
<td>• Providing translation for all vital documents.</td>
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<tr>
<td>• Ensuring targeted outreach of services, programs, and events.</td>
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<tr>
<td>• Being prepared to provide interpretation in these languages at all public events in response to advance requests submitted.</td>
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<tr>
<td>• Prioritizing the hiring of bilingual/multilingual staff in these languages.</td>
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</table>

Departments should prioritize and consider, in other instances, language access services for the languages indicated in Table 1. Additionally, Departments should assess priorities and considerations, based on the languages of target populations for specific services or programs. This may require consideration of languages not on the threshold languages list in Table 1, including undercounted and underserved ELL populations, with a focus on Indigenous languages with low literacy and languages spoken by recent migrants and refugees.

While this LAP establishes threshold languages and guidance in providing meaningful access to services for ELL constituents, Departments should identify diverse strategies to provide language access services such as the use of vendor language lines and CBO collaboration, in case ELL constituents approach the Department for services in languages not listed.
As emergencies, including but not limited to declared states of emergency in the City of Los Angeles, that require mass dissemination of information and services to the public arise, the Coordinator will determine if it is necessary to expand the City’s threshold languages to the following list of sixteen (16) emergency languages listed in Table 2. In such cases, all emergency response-related communications, services, and materials must be disseminated and provided in the thirty-one (31) threshold and emergency languages, at a minimum. This may include providing urgent language access services such as interpretation, translation, and creation of culturally relevant materials in order to reach key ELL populations affected. This requirement is not intended to delay or prohibit Departments from issuing emergency communications in a timely manner. More information on emergency response is provided in Section 8-K “Language Access Emergency Response.”

Table 2: City of Los Angeles Emergency Response Languages

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<tbody>
<tr>
<td>15. Hebrew</td>
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<tr>
<td>16. French</td>
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<tr>
<td>17. Amharic</td>
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<tr>
<td>18. Punjabi</td>
</tr>
<tr>
<td>19. Urdu</td>
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<tr>
<td>20. Ilocano</td>
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<tr>
<td>21. Portuguese</td>
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<tr>
<td>22. Pashto</td>
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<tr>
<td>23. Yoruba</td>
</tr>
<tr>
<td>24. Ukrainian</td>
</tr>
<tr>
<td>25. Italian</td>
</tr>
<tr>
<td>26. Haitian Creole</td>
</tr>
<tr>
<td>27. Q’anjob’al</td>
</tr>
<tr>
<td>28. Ayuujk</td>
</tr>
<tr>
<td>29. Zapotec</td>
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<tr>
<td>30. K’iche’</td>
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<tr>
<td>31. Chinantec</td>
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</table>

6. Four Factor Analysis for the Provision of Language Access Services

Providing meaningful language access starts with an individualized assessment of department operations. Executive Order 13166, which created federal language access policy, provides the Four Factor Analysis as a tool to help entities assess their obligations under Title VI to ensure meaningful access for ELL constituents. The following adaptation of the Four Factor Analysis will help Departments conduct their own assessment for prioritizing language access services.

The first factor to consider is the number or proportion of ELL constituents eligible for services or, more broadly, that interact with the Department. This LAP presents a Citywide Threshold
Languages List for FY 22-24 (See Table 1) for Departments to use as a reference in determining adequate language access services (See Table 1). Based on priorities for specific services or programs, Departments should note that this may require consideration of languages that are not included in Table 1.

The second factor to consider is the frequency with which ELL constituents come into contact with programs and services. In order to understand the ways and frequency with which ELL constituents interact with Departments, it is important to identify, track, and evaluate changes in interactions with these constituents. These interactions may include, but are not limited to: applying and/or participating in programs or services; calling hotlines or information line calls; being contacted through outreach efforts; public meetings and hearings; engaging with publicly accessible stations such as reception desks or help desks; visiting informational websites, including online application web pages and portals; engaging with written materials intended for wide public distribution or for targeted distribution; and collecting evaluations or complaints. Departments should track data described in Section 13 “Tracking of Language Services” and use it to perform ongoing assessment on the frequency of ELL constituent interaction to plan for future provision of services, as well as to identify gaps in programs and services among underserved populations. Departments should prepare for the potential need to provide language access services for ELL populations that make up more than 5% of a program’s service population, regardless of their inclusion in Table 1.

Additionally, Departments should also identify ELL populations that are not interacting with their respective Department due to existing language barriers and strive to improve their outreach and engagement with these constituents through language access offerings.

The third factor to consider is the nature and level of importance of the program, service, or information provided. Departments should assess programs, services, and points of contact with the public when determining the appropriate language access services for ELL constituents. Guidance on identifying vital documents for translation is provided in Section 8.B “Provision of Language Access Services to the Public: Translating of Documents.” Departments should consider the importance of the content being provided for public events and account for their internal capacity to coordinate interpretation, as indicated in Section 8.F “Provision of Language Access Services to the Public: Planning for Multilingual Events.”

The fourth factor to consider is the Department resources available to cover language access services. Departments should assess the availability of resources, including the following:

a. Internal staff capacity to meet language access needs through trained bilingual/multilingual staff that can serve as translators and/or interpreters.

b. Cost and availability of quality vendor language services.

c. Federal funds received for any program or service that should be earmarked for language access services given federal requirements to provide meaningful access.

d. City General Fund allocations for that Department’s language access budget, including spending for previous years.
e. Any other potential funding from sources like Special Funds, state funds, and private funds that could cover the Department’s language access expenses.

7. Public Awareness of the Availability of Language Access Services

When language access services are not readily available, ELL constituents are less likely to participate in or benefit from City programs, services, and information, even if needed. Therefore, Departments must make language access services and tools readily available. In order to provide ELL constituents meaningful access, Departments must ensure public awareness of the availability of language access services. This awareness should include notice that language services are available free of charge. Multilingual signs, posters, and/or other audio/visual tools, in-print, prominently displayed at help desks, public counters, and other common areas, and online should be used to communicate such availability.

Department websites should have easily accessible links to translated material and all updates to English websites must also be made in non-English languages.

Additionally, the Coordinator will work with Departments and vendors that could include CBOs to provide public education on the City’s language access program, including this LAP, to ensure widespread awareness of the availability and process for requesting language access services.

8. Provision of Language Access Services to the Public

This section outlines guidance for Departments for the provision of language access services and ensuring meaningful access for constituents.

A. Identifying the Language of an English Language Learner Constituent

When interacting with an ELL constituent, Department staff may need to use language identification tools to identify the language spoken, including visuals to assist constituents in self-identifying their language and vendor-provided resources to assist with language identification. A sample of a poster used as a visual reference when staff cannot readily identify a language spoken is included in Section 15 “Appendix.” In some instances, ELL constituents may have someone reach out on their behalf to explain that they do not speak English, making language identification efficient, however, this is not always an option.

For deaf, hard of hearing and/or visually impaired constituents, there may be additional barriers in identifying their language. Deaf and hard of hearing constituents will generally self-identify through spoken word or visual cues. The Department on Disability can provide more information on how to assist and request interpretation services for these constituents.\(^\text{12}\)

\(^{12}\) Los Angeles Department on Disability. Auxiliary Aids and Services. https://disability.lacity.org/services/auxiliary-aids-and-services
Early identification of language needs is important for the provision of meaningful access. Department staff should identify the language and communication needs of the ELL constituent upon first contact and on an ongoing basis throughout future provision of services as language access needs may change depending on the nature of interactions, services, and programs. More information on this can be found in Section 8.C “Providing Interpretation Services.”

B. Translating of Documents

Vital Documents for Translation:

Vital documents are paper or electronic written materials that are necessary for meaningful access. Vital documents contain information that is critical to obtaining City services, programs, and/or benefits. This can include forms, policies, and informational/outreach materials, among other materials. Such documents may solicit important information from a constituent, provide important information to a constituent, or affect a constituent’s rights, duties or privileges with regard to the services being provided.

Examples of vital documents include but are not limited to: applications and their instructions, formal notices, complaint forms, contractual agreements, correspondence, outreach materials in a paper or electronic format that inform constituents about their rights and responsibilities or eligibility requirements for service benefits or program participation, and documents that pertain to the health and safety of the public.

Vital documents should be translated according to the priorities established for the threshold languages in Table 1 and other additional languages according to intended audience or service population as described in Section 5 “Threshold & Emergency Response Languages,” and made available to the public in-print and online.

Standards for Translation:

In general, communications in their original drafting language, most often English, should go through various revisions with plain language principles in mind, before being published and before translation to ensure clarity and understanding.

In order to ensure consistency across translations, Departments should develop and maintain an internal glossary in English and, at minimum, in frequently translated languages, for common terminology and specialized language used by that Department. This glossary should be made available to vendors and Department staff who support communications and translation.

Departments should develop a style guide for all translation assignments for both vendors and Department staff who may translate at any point. A style guide should include the following instructions for clear, uniform, and timely translation:

i. Contact information for the Department staff who can best answer questions about the original written communication.
ii. Due date for translation that accounts for ample time for Department staff to review translation and give feedback to translator, if any, before publication of translation.

iii. Word count of original document.

iv. Language register (referring to the level of formality to be used), which should align with the original language.

v. Preference in regards to gendered or gender-neutral language. This applies to languages that default to a specific (often masculine) gendered ending. Departments may prefer gender-inclusive language for specific communications and, therefore, should make this request to vendor and confirm that vendor can fulfill the request.

vi. Links or attachments to helpful reference materials to ensure consistency, including, but not limited to Department-specific glossaries and previously translated materials that may serve as reference.

vii. Any relevant information in regards to formatting and layout.

viii. Whenever possible, original documents should be provided in an editable Word document.

In order to ensure accuracy before public dissemination, Departments should ensure that all translations are reviewed by a second trained translator (See Section 11, “Staff Training”), especially for any written materials initially translated via machine translation.

Requests for Translation:
Upon receiving a request for translation of a document that is not already available in the ELL constituent’s language, Departments must provide constituents with contact information to the staff person that will assist them and a reasonable timeline for when they should expect to hear back about the completion of a translated document. For some languages, such as Indigenous languages with no written component, it may be necessary to have an interpreter sight-translate the document.

C. Providing Interpretation Services
Constituents should be informed about the availability of free-of-charge language access services.

Department staff should identify the language and communication needs of the ELL constituent upon first contact and on an ongoing basis throughout future provision of services as language access needs may change depending on the nature of interactions, services, and programs. Department staff should note if ELL constituents have different preferences for their oral/signed and written languages. Written intake or registration forms should include a section where constituents can indicate the need for translation/interpretation into a specific language other than English.

In requesting interpretation services from Department staff or vendors, as much information as possible should be provided to the interpreter on the nature of the services or programs being provided, including any materials that may help to provide context.
For consecutive interpretation, Department staff should speak in short phrases while pausing to allow for interpretation. For simultaneous interpretation, staff should speak at a slow, moderate pace. Staff should speak in simple language, with clear explanation of acronyms and complex terms, avoiding any slang or phrases that may not translate.

When working with an interpreter, Department staff should always speak directly to the constituent and not the interpreter. Except in emergency situations when many people are speaking at once, interpreters should always speak in first person to support direct communication.

D. Evaluating Translation & Interpretation Services

At the end of each service interaction, ELL constituents should be asked to provide a brief evaluation on their experience receiving language access services, including their assessment on the quality of the services received so the Department can track, report, and assess for updates and improvements to their process and their LAP. Constituents shall have the option to remain anonymous and should also be made aware of the Department’s complaint process. For details on the complaint process, see Section 9, “Complaint Process.” Additionally, Department staff should maintain a record of the information required for reporting as described in Section 14 “Annual Reporting.”

E. Additional Considerations for Providing Translation & Interpretation Services

For certain translations where the document may impact the rights and obligations of an individual, a certified procured translator may be required, particularly when specialized terminology is used in a medical, legal, or labor context. When translating any official notices or other legal documents, the English version of the document prevails as the City’s official document and the translation should carry the following disclaimer in English and the translated language: “This document was translated to assist in your understanding of your rights and obligations. The English language version of this document is the official, legally controlling document.”

Similarly, for certain proceedings, a certified\(^\text{13}\), in-person, procured interpreter may be required, particularly when specialized terminology is used in a medical, legal, or labor context, for example. In-person interpretation is preferable due to the opportunity it allows to capture nuances in non-verbal communication. Over the Phone Interpretation (OPI) or Video Remote Interpretation (VRI) should be considered if in-person interpretation services are unavailable and when safety protocols require it.

\(^{13}\) There is no single certification body or accreditation process for the translator and interpreter professions, rather a variety of independent accreditations, certifications, and trainings based on specialization. Departments should have a clear understanding of vendors’ training and experience qualifications for their staff and subcontractors to ensure they are in alignment with the Department’s language service needs, especially when communications include medical, legal, or other specialized language.
Localized/Regional Language Access Services:
To avoid miscommunication and maintain trust, Department staff is encouraged to match localized regional language (considering country and/or municipality, especially for Indigenous, Asian Pacific Islander, and Middle Eastern languages) as much as reasonably possible when providing constituents with language access services. For example, providing constituents who speak Mixtec from the Mexican state of Guerrero, an interpreter from the same or nearby municipality, instead of assigning an interpreter from the state of Oaxaca, where a different variant of Mixtec is spoken.

Providing access in Indigenous languages can present unique challenges because it is often difficult to find language access providers who are able to speak both the Indigenous language and English with enough proficiency for meaningful communication. In some cases, it may be necessary to provide relay interpreting, where the first interpreter renders the Indigenous language into a more common foreign language (e.g., from one variant of Zapotec to Spanish) and another interprets from the more common language to English (in our example, Spanish to English).

In providing services for deaf and hard of hearing constituents, it is important to note that not all sign language speakers understand American Sign Language (ASL) and will instead need access in sign language from another region or country of origin. For example, a constituent may be most comfortable with Japanese Sign Language, but not as familiar with ASL. In addition, International Sign Language is used by the deaf community outside geographic boundaries.

Requests for Sign Language interpreting services should be made through the Department on Disability website\(^1\). Requests should be made at least five (5) days in advance wherever possible. Specialized requests (such as for trilingual interpreters, events using highly technical language, or multiple interpreter large events) should be given as much lead time as possible.

Use of Friends/Family as Interpreters:
Departments must avoid the use of friends and family as interpreters, even when requested by ELL constituents. The Office of Civil Rights of the U.S. Department of Health and Human Services (HHS) recommends that friends and family members, especially minors, should not be used as interpreters, except “in an emergency involving an imminent threat to the safety or welfare of an individual or the public, where there is no qualified interpreter for the individual with limited English.” As established by HSS, a family member or friend’s ability to effectively, accurately, and impartially interpret may be compromised because of their personal involvement and connection to the constituent. Departments shall provide an interpreter release waiver in the case that an ELL constituent declines City provided language services and requests to use a

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\(^1\)Los Angeles Department on Disability. *Service Request Form.* [https://disability.lacity.org/requesting-sli-cart-services](https://disability.lacity.org/requesting-sli-cart-services)
family member or friend as an interpreter. A sample Interpreter Release Waiver is provided in the Appendix.

F. Planning for Multilingual Events

Based on the City’s threshold language guidance in Section 5 “Threshold & Emergency Response Languages,” and with consideration of target audience, Departments must take reasonable steps to ensure the availability of translated materials and interpretation services for public in-person and virtual events (such as hearings, meetings, webinars, and presentations).

When planning an event with interpretation, interpreters should be confirmed at least two (2) weeks in advance or, in accordance with vendor request guidelines. In requesting interpretation services from Department staff or vendors, as much information as possible should be provided to the interpreter on the nature of the information being provided, event duration, location, including any materials that may help to provide context such as copy of presentation in English and in target language, agenda or program, and handouts. When working with specific interpreters for the first time, Department staff is especially encouraged to hold planning meetings or tech rehearsals ahead of the event in order to discuss event logistics and event content. Simultaneous interpretation, which requires the use of equipment, is recommended for events or meetings where a large group of people is in attendance. Department staff should ensure that interpreters work in pairs for events with simultaneous interpretation that last longer than 45 minutes, as interpreter accuracy can decrease after long periods of interpreting. Additionally, interpreters have more capacity to provide technical support when working in pairs.

Event outreach materials should include information on how the public may request interpretation services if these are not already being made available for the event.

When staff receive language requests less than 72 hours before an event, they should attempt to accommodate to the best of their ability. For Departments whose capacity permits, it is encouraged to have bilingual/multilingual staff on standby for the event in case a constituent needs interpreter services but did not notify the Department in advance. Only trained Department staff who are currently receiving the two premium levels bilingual bonus should serve as interpreters as indicated in Section 8.H “Provision of Language Access Services to the Public: Role of Bilingual/Multilingual Department staff” and Section 11 “Staff Training.”

For in-person events with simultaneous interpretation, Department staff should plan and budget to have interpretation equipment (transmitter, microphone, receivers, and headsets) available. The City’s Information Technology Agency (ITA) can rent up to 25 receivers and headsets to

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15 The Coordinator will provide a translation of this waiver in all 31 languages listed in Tables 1 and 2 of the LAP.
Departments on a first come first serve basis. City staff may contact Council Audio at ita.councilaudio@lacity.org to request equipment with a lead time of at least 48 hours, equivalent to two (2) full business days. When there is a need for more than 25 receivers and headsets, Departments will have to rent through a vendor. For events where there is interaction among a group that does not share the same language (such as hearings, meetings, or town halls), all attendants (not just the ELL constituents) should use interpretation receivers and headsets. This is to ensure that ELL constituents can also speak up and communicate in their primary language while ensuring that others can understand their message through the interpretation equipment. On the day of the event, additional staff should be assigned to hand out and collect interpretation equipment so that interpreters can focus on performing their duties.

For virtual, online events with simultaneous interpretation, Department staff should ensure that coordinating staff and interpreters are familiar with the digital platform being used, ideally by scheduling a meeting and tech rehearsal ahead of the event. Departments must also provide instruction to ELL participants on how to access the interpretation feature before the event begins, considering the technological literacy of the intended audience.

Departments should assess which vital documents will require translation for the event. These should also be made available to the interpreters for consistency in use of terminology.

Departments shall incorporate an evaluation component on language services provided at the end of the event to collect public feedback.

G. Outreach & Active Engagement of English Language Learner (ELL) Populations

In order to engage ELL communities and meet the City’s goal of building a more inclusive Los Angeles, Departments shall work to further incorporate language access into outreach efforts necessary to provide meaningful access. This may include:

i. Developing a plan for dissemination of culturally relevant outreach materials to reach intended ELL populations, based on threshold languages and localized service population assessment.

ii. Translating all outreach materials for in-person events, webinars, programs and services into multiple languages, ensuring that these are also available online for download. Event outreach materials should include information on how the public may request interpretation services if these are not already available for the event.

iii. Working directly with vendors that could include CBOs that have established trust and credibility, and with media catering to specific ELL populations, to do targeted outreach in the primary language of ELL constituents based on the intended service population.

iv. Departments shall consider disseminating information through digital platforms that are widely used by ELL communities (such as Facebook, WeChat, and
WhatsApp) and should create easy-to-use digital tools, such as QR codes or instructional videos, that help ELL constituents access information.

It is also important to consider the ways that digital tools can help or hinder access to services when engaging ELL constituents. The digital divide for ELL constituents can make these communities harder to reach. Technological literacy can prove to be a barrier to City programs and services, therefore Departments should consider the accessibility of digital tools and platforms when engaging ELL communities.

H. Role of Bilingual/Multilingual Department Staff

Departments should work with Personnel Department to create and hire for positions that could be eligible to receive, at minimum, the one premium, or bonus, level of bilingual pay to serve ELL constituents in the citywide threshold languages listed in Table 1, as well as in the languages that are most commonly requested or that represent significant language communities in their service population. These classified positions require staff to complete language assessments administered by the Personnel Department to determine their proficiency in the language(s) they speak.

Whenever possible, and as these staff positions receiving bilingual premium compensation are filled, Departments should provide direct services and assistance in the ELL constituent’s preferred language through these bilingual/multilingual staff.

As an alternative, for reasonable requests, Departments may call on staff within the Department that currently receive the two premium levels of bilingual pay and have completed training to act as an interpreter between Department staff and ELL constituents, as provided by the Coordinator. If no Department staff are available to provide interpretation, Departments may call on vendors to provide in-person or remote interpretation (OPI or VRI).

Similarly, for translation of written materials, Departments may call on trained Department staff who currently receive the two premium levels of bilingual pay to support in the translation of written materials or the review of translated materials, and/or request these services from vendors. More information can be found in Section 11 “Staff Training.”

Departments shall maintain an updated, internal list of staff currently receiving the two premium level of bilingual pay that includes the language(s) they speak, the training they have received as it pertains to language access, and their contact information. This list shall be made available to all Department staff for reference when interpretation or translation needs arise.

I. Working with Vendors

The Coordinator will provide a list of approved vendors, including CBOs, that have been vetted under the standards provided in this section. Departments may procure services individually and/or join existing contracts held by other Departments, so long as each Department has budgeted for the services needed.
Departments shall maintain an updated list of vendors, including CBOs, with the language services they provide, their contact information, and the process for requesting services. This list shall be made available to all Department staff.

In developing Requests for Quotes (RFQs), Departments must use the following factors to determine vendor eligibility to provide language services to the public, on behalf of the City:

i. Vendor expressly outlines their service delivery procedures, including response times to service requests.

ii. It is preferred that translators and/or interpreters hired directly or sub-contracted by a vendor be locally-based and/or have working knowledge of the City of Los Angeles to ensure accurate level of localization in the services being provided.

iii. Translators and/or interpreters receive sufficient professional training (including compliance with both federal and state certification requirements, if applicable) and experience in their field to provide quality language services as requested and take part in ongoing professional development. This should include training for vendor translators and interpreters on incorporating feedback from Departments, to continue improving the delivery of services.

iv. Vendor has quality assurance controls to ensure accurate translations that include a copy-editing or review process of an initial translation.

v. Vendor has quality assurance controls to ensure accurate and quality interpreter performance, wherever possible, that includes, but is not limited to, a second and third party evaluation process and/or other evaluation processes.

vi. Vendor has a client feedback mechanism for translation and interpretation services that is utilized to ensure client satisfaction.

vii. Vendor has procedures for effective complaint resolution when an error in translation and/or interpretation is detected.

J. Role of Community-Based Organizations (CBOs):

Departments are encouraged to consult CBO partners in the planning, outreach, and implementation of programs and services in order to ensure ELL constituents’ inclusion. Departments must enter into a formal agreement with CBOs, as vendors, whether services are at a cost or volunteer. Additionally, Departments shall not request volunteer or free services from CBOs, unless there are exceptional circumstances where there has been clear indication from the CBO that they are willing and able to provide such services at no cost, as detailed in a formal agreement with the Department.

K. Language Access Emergency Response

When emergencies arise that require mass dissemination of information and services to the public, it is important for Departments to be prepared to provide language access in their emergency response efforts to ensure that all critical information reaches the public, including ELL constituents. The Coordinator will provide guidance on integrating language access into
emergency response efforts through collaboration with the Language Access Working Group, Language Access Liaisons, and key vendors (including CBOs). These efforts may also include identifying funding for emergency response language access and/or using emergency reserves held by the City’s language access program.

9. Complaint Process

This section outlines guidance for Departments in providing the public with an accessible, clear, and uniform complaint process.

Departments are responsible for implementing a language access complaint process that is clear and accessible to the general public. The Coordinator will provide resources to ensure consistency and uniformity across Departments. The language access complaint process may be integrated into already existing complaint processes within the Department so long as it is accessible to ELL constituents. Complaint processes should be made available both in-person and remotely, in written, oral, and/or sign language form, in all threshold languages listed in Table 1, collecting as much of the following information as possible:

a. Date of complaint
b. Name of constituent
c. Phone number and email, if any
d. Date of services originally requested
e. Language in which service was originally requested, with as much specificity on linguistic variant
f. City program or services for which language services were requested
g. If any, additional language(s) in which constituent can receive information while the Department attempts to secure services in the requested language

Upon receiving a language access complaint, Departments must provide constituents with a written response in English within thirty (30) days, and to the best of their abilities, in the language of ELL constituent with:

a. A tracking number for that language access service complaint for easy identification in future correspondence relating to the matter.
b. Contact information for the designated staff person and/or Language Access Liaison in that Department responsible for ensuring resolution of the complaint.
c. An appropriate timeline for when the constituent will hear back from the Department with steps to be taken to address the complaint.

Resolution for language access complaints must be provided via a written response in both English and in ELL constituent’s language indicated and must include the following:

a. Findings of complaint.

17 During an emergency response when the Coordinator has called for the expansion of threshold languages listed in Table 1 to the additional emergency response languages listed in Table 2, this complaint process should also be made available in all 31 languages listed.
b. Steps taken to resolve the complaint and provide language service requested, including any necessary steps to begin or resume services that were previously inaccessible due to lack of language access in initial interaction.

c. Process for appealing the Department’s findings and resolution.

d. Contact information for the designated staff person and/or Language Access Liaison in that Department responsible for ensuring resolution of complaint.

e. Contact information for the Coordinator.

Pending complaints and appeals should stay any negative action, such as denial of services or eligibility that may have resulted from language access-related issues.

Language Access Liaisons are responsible for compiling all language access complaints received by their Department staff. Copies of all language access complaints submitted to Departments must be sent to the Coordinator within fifteen (15) days of receipt along with a summary indicating the following:

a. Detailed description/explanation for the unavailability or inadequacy of language services.

b. Steps taken or to be taken to address/resolve unavailability or inadequacy of language service requested and to provide meaningful access to services in constituent’s language.

Upon receiving a copy of complaint and summary of complaint from a Department, the Coordinator will provide guidance, if needed, to resolve the matter. Guidance may include technical assistance to improve language access offerings by the Department.

The Coordinator should also be notified of the final resolution to a complaint and any appeals to complaint resolutions within fifteen (15) days of receipt.

The Coordinator will recruit the support of the City Attorney, as necessary.

The Coordinator will include the number, nature, and status of Department and Citywide complaints in the annual Citywide Language Access Report.

10. **Community Input Process**

The City of Los Angeles recognizes the value and importance of receiving direct feedback from ELL constituents and trusted community-based organizations to strengthen the City’s language access program and better serve ELL constituents. In order to receive input from constituents and other members of the public, the Coordinator will host biennial Community Input Sessions which will result in recommendations for Citywide and Department plan updates for the following fiscal year. These recommendations will be included in the Citywide Language Access Report for that fiscal year.
The Coordinator and supporting staff will consult with constituents and CBOs on the following components of the LAP:

a. Provision and quality of language access services to the public
b. Outreach and public awareness of the availability of free language access services
c. Language access in emergency response efforts
d. Training as it pertains to language access services provided by Department staff and vendors
e. ELL data and threshold languages assessment
f. Complaint process
g. Community input process

In consulting with the public, the Coordinator and supporting staff will make sure to engage the following stakeholders:

a. Constituents from ELL populations who access City language services and can speak to these, as well as constituent populations who sparingly access or do not access language services due to existing barriers. For example, this includes constituents who are deaf or hard of hearing and need to access services in sign languages other than ASL.
b. CBOs who serve ELL populations from the threshold languages in Table 1, as well as CBOs that serve undercounted populations, including, but not limited to populations that speak languages in Table 2.
c. Professional interpreters, translators, and consultants that can speak to the quality of services provided and advise on best practices, model policies, leading technology, and training developments in the field of language access.
d. Select government partners at the county, state, and federal levels with overlapping ELL constituents and/or similar language access objectives.

As part of the Community Input Process, the Coordinator and supporting staff will work with select Departments to implement a biennial Community Translation Review process in which a selection of vital documents will be reviewed by a panel of ELL constituents and CBOs for clarity, accuracy, and understanding of these documents and to further improve language access and public input in City communications. It is strongly suggested that panel participants be compensated for their time and expertise.

11. Staff Training

In order to build capacity and competency around language access, City staff must engage in ongoing training to meet the existing and emerging needs of ELL constituents, including on changes in ELL populations and updates to Citywide and Department language access plans.

City staff will receive language access training on expanding public awareness about the availability of language access services and on the provision of these services, including how to accurately identify language needs of ELL constituents and provide support early in an interaction.
When possible and appropriate, Departments should support professional development for staff to strengthen their language ability in languages other than English.

Trainings listed will be conducted on City time and will be paid with City funds, including Departments funds.

Training on Plain Language

External affairs staff within Departments, including communications and outreach teams, should receive plain language training to ensure that plain language principles are incorporated in the drafting of written and visual communications for the public. If possible, other staff members involved in drafting public-facing documents should receive this training.

Training for Department Language Access Liaisons and Public-facing Staff

More specifically, Department Language Access Liaisons and Department staff who serve as first point of contact and/or have regular interaction with the public shall be trained in the following:

a. Federal, state, and local language access laws
b. Citywide and Department language access plans
c. Raising public awareness of availability of City-provided language access services
d. Protocols in the provision of language access services, including:
   i. How to identify, serve, and interact with ELL deaf, hard of hearing, or visually impaired constituents.
   ii. How to work with in-house interpreters and translators, vendors, and language access-related technology.
   iii. How to identify vital documents for translation.
   iv. Tracking of services for annual reporting requirements.

Training for City Staff Receiving Two Premium Level of Bilingual Pay

Only trained Department staff who are currently receiving the two premium level bilingual bonus should serve as interpreters and translators.\(^\text{18}\) Staff who have passed language proficiency assessments administered by the Personnel Department, and are currently receiving the two premium levels of bilingual pay, shall be eligible to receive ongoing interpreter and translator training to obtain the tools and skills to perform these duties in order to grow internal capacity to meet ELL constituent needs. Staff receiving the two premium levels of bilingual pay should not be asked to perform interpreting or translation duties without first receiving adequate training, as provided in collaboration with the Coordinator.

### 12. Department Language Access Plan

The individualized Department Language Access Plan for FY 2023-25 shall be submitted on March 30, 2023 to the Coordinator and, thereafter, ninety (90) days prior to the start of every other fiscal year (biennially). This will give the Coordinator time to review and provide feedback and technical assistance on each Department Language Access Plan prior to the start of the fiscal year. The Department Language Access Plan and its updates shall be published on the respective Department website.

The following is a list of considerations for Departments to make when assessing updates and improvements to the Department Language Access Plan and in determining budget allocations for the future fiscal years:

- a. Significant changes in programs and services.
- b. Changes in threshold languages and service population, including an analysis of services provided and the target ELL service populations to assess what language access needs remain unmet.
- c. Internal policies, procedures, and forms that support the provision of language access services.
- d. Need for bilingual/multilingual staff, including full-time translators and interpreters, and full-time department-level language access coordinators.
- e. Evaluations and complaints received.

The content of this LAP shall serve as a model for Departments to use in creating their Department Language Access Plan. Additionally, a template is provided in Section 15 “Appendix” for further guidance.

### 13. Tracking of Language Services

Departments are responsible for tracking certain language access information and include this information in the Department’s Annual Language Access Report described in Section 14 “Annual Reporting.”

Tracking interactions with ELL constituents and language access requests shall include:

- a. Program or service for which language access services were requested, and language requested.
- b. Program or service for which language access services were provided, and language provided.
- c. Type of language service provided (interpretation or translation).
- d. Whether language access service was provided by Department staff or vendors.
- e. Constituent service evaluation, if received.
- f. Funds allocated for and spent on language access services, including source of funding (General City Fund, Special Funds, state funds, federal funds, private funds, other).
14. **Annual Reporting**

Departments are required to prepare an annual Department Language Access Report and deliver it to the Coordinator no later than sixty (60) days after the end of the fiscal year, starting on August 30, 2023. This Report shall include:

a. Current designated Department Language Access Liaison name and contact information, as well as any other staff directly supporting with compliance of the LAP and implementation and coordination of the Department Language Access Plan, including:
   i. A list of bilingual/multilingual Department staff, including those available to provide translation and/or interpretation services.

b. All tracking information described in Section 13 “Tracking of Language Services,” in addition to the following:
   i. List of vital documents and other materials translated, and in what languages.
   ii. Efforts to conduct education and outreach to expand public awareness on the availability of free language access services.
   iii. Number of events for which the Department provided interpretation, and in what languages.
   iv. Funds allocated for and spent on language access services.

c. Copies of language access constituent evaluations.

d. List of language service vendors used for that fiscal year (including CBOs).

e. Summary of language access efforts in emergency response work, if any.

f. List of language access and related trainings provided to Department staff.

The Coordinator will prepare an annual Citywide Language Access Report and deliver it to the Mayor, the City Council, and the City Attorney no later than one hundred and twenty (120) days after the end of the fiscal year, starting on October 30, 2023, which will include:

a. A summary of Citywide language access data (ELL population data and other relevant statistics);

b. Community Input Process findings; and

c. Department Language Access Reports for the prior fiscal year.

This report shall be made available to the public through the City website.

15. **List of Appendices**

A. Appendix A - Language Identification Sample Poster
B. Appendix B - Interpreter Services Waiver Form
C. Appendix C - Department Language Access Plan Template
D. Appendix D - Citywide and Department Language Access Plan Updates & Reporting Timeline
Appendix B

City of Los Angeles
OFFER OF FREE INTERPRETER SERVICES WAIVER FORM

I, ____________________(print name), acknowledge that ____________________(name of City staff) has notified me of my right to an interpreter provided by the City, at no cost to me, as required by the City of Los Angeles Executive Order 32.

By signing below I agree that I have refused this service and opted to not rely on an interpreter and/or instead am choosing to receive assistance from someone I have identified to be my interpreter. I am aware that this individual I have chosen as my interpreter was not identified by or vetted through City of LA staff and that ____________________(City Department) is neither responsible for the provision of these services nor does incur any liability that may result from these services.

I am also aware that this waiver only applies to this one instance. If I require interpreter assistance from ____________________(City Department) in the future, I will notify the City Department directly to request this service.

____________________
Print Name

____________________
Signature

____________________
Date
The following template is provided for City Departments to assist in the drafting or updating of their individualized language access plan. Departments who have an existing plan must ensure that the following components are included. Please use the Citywide Language Access Plan FY 22-24 (LAP) for further guidance and as a model.

1. Introduction: provide the purpose and background for the language access plan for the department. See LAP for a model.

2. Definitions: include any relevant definitions in the LAP and any additional definitions that Department staff may find useful in the Department’s provision of language access services.

3. Governing Language Access Policies and Laws: important to list all those provided in the LAP and include any additional federal, state, or local regulations related to language access that the Department must comply with due to the nature of the Department’s work.

4. Key Roles for Department Language Access Plan Implementation: provide descriptions of key roles engaged in the Department language access work, including implementation of the Department Language Access Plan. These may include some of the roles listed in the LAP. Name and contact information for these roles is not necessary. Examples of these descriptions include:
   a. Description of Department Language Access Liaisons role and duties on behalf of the Department
   b. Description of bilingual/multilingual staff roles and duties in your Department, with specificity on the role of staff receiving the one premium level bilingual pay and the role of staff receiving the two premium levels of bilingual pay.
   c. Description of roles and duties of staff working directly with the public, including with ELL constituents.

5. Threshold Languages: any program & service-specific threshold languages for the Department, in addition to the threshold languages provided in Table 1 of the LAP. See guidance provided on Four Factor Analysis in this document and in the LAP.

6. Four Factor Analysis for the Provision of Language Access Services: identifying program & service-specific language access services using the Four Factor Analysis described in the LAP.

Departments should be as comprehensive as possible in assessing language access needs across Department programs and services. This assessment should include an explanation of how the Department arrived at the threshold languages in the previous section, including specific factors that were considered. For example, a Department that is hosting a housing assistance program to support elderly constituents in the Mid-Wilshire and Pico-Robertson area, may prioritize the provision of language access services in Amharic, given
the concentrated population of Ethiopian residents, and include it in its threshold languages list for that specific program, and as able and needed, for other programs and services within that Department. This assessment should provide Department staff with a clear understanding of what languages to prioritize, including any additional to those listed in Table 1 of the LAP, and what services to prioritize for those languages. See LAP for a model.

a. The first factor to consider and assess is the number or proportion of ELL constituents eligible for services or, more broadly, that interact with the Department.
   i. For example, Departments should prepare for the potential need to provide language access services for ELL populations that make up more than 5% of a program’s service population, regardless of their inclusion in Table 1 of the LAP. Some of the additional languages necessary may overlap with the emergency response languages listed in Table 2 of the LAP.

b. The second factor to consider is the frequency with which ELL constituents come into contact with programs and services.
   i. Departments should use any already existing and available service tracking data, in addition to the data described in Section 13 “Tracking of Language Services” of the LAP and use it to perform an assessment on the frequency of ELL constituent interaction with their programs and services.
   ii. While it is important to continue responding to the language needs of ELL constituents who frequently interact with the Department, this factor analysis should also be used to identify ELL communities in the Department’s service population who may be underserved due to existing language barriers and, thus, may need to be re-prioritized in the provision of language access services.

c. The third factor to consider is the nature and level of importance of the program, service, or information provided. Departments should assess programs, services, and points of contact with the public when determining the appropriate language access services for ELL constituents.
   i. As Departments work to provide meaningful access to ELL constituents in as comprehensive a manner as possible, it is important they prioritize the integration of language access into the strategic planning and budgeting of their most critical programs and services. In considering the mission or goal of a program or service or the Department as a whole, Departments should reflect on the following questions:
     1. What would it mean for an ELL constituent to not receive access to this program or service in their language? In other words, what is the urgency for an ELL constituent to have information about this program or service in their language?

d. The fourth factor to consider is the Department resources that may be available to provide language access services, including the following:
i. Internal staff capacity to meet language access needs through trained bilingual/multilingual staff that can serve as translators and/or interpreters.

ii. Cost and availability of quality vendor language services.

iii. Federal funds received for any program or service that should be earmarked for language access services given federal requirements to provide meaningful access.

iv. City General Fund allocations for that Department’s language access budget, including spending for previous years.

v. Any other potential funding from sources like Special Funds, state funds, and private funds that could cover the Department’s language access expenses.

Departments should take inventory of the resources available to meet language access needs and provide clear instruction as to how these may be allocated according to threshold language and priority services for those languages. Department staff should be able to clearly identify which funds and resources can be used to meet certain language access needs, including in what languages and for what programs and services.

vi. For example, a Department may identify private funding for a program that targets a specific population that includes ELL constituents. In the Department Language Access Plan, the Department may indicate an allocation of a specific amount from this private funding to cover the costs of a multilingual outreach campaign for that program.

7. Identifying the Language of an ELL Constituent: this calls for the creation and/or amplification of any Department specific tools or processes to help staff more efficiently identify the language of an ELL constituent. For example, a Department may develop a language identification card that allows the public to point to their preferred spoken language when serving them at public counters. In order to be effective, this card should include all 14 languages indicated in Table 1 of the LAP.

8. Public Awareness of the Availability of Language Access Services: provide any Department tools or processes being used to increase public awareness about the availability of language access services. For example, in-person signage, social media communications, and/or flyers providing a brief message, with visuals, indicating that language access services are available. In order to be effective, these communications should be translated to in all 14 languages indicated in Table 1 of the LAP.

9. Provision of Language Access Services to the Public: provide any Department tools or processes being used to support meaningful access for ELL constituents.
   a. Translation of documents
      i. Listing of vital documents for translation
      ii. Standards for translation
         1. Provide a sample style guide for Department translations as described in Section 8.B “Provision of Language Access Services to the Public: Translating of Documents” of LAP
      iii. Describe process for handling requests for translated materials
   b. Interpretation Services
i. Describe process for handling requests for interpretation

c. Planning for multilingual events: process for planning and coordinating a multilingual event within the Department.

d. Outreach & Active Engagement of ELL populations: including identifying program or service-specific outreach and engagement efforts

e. Role of bilingual/multilingual Department staff

f. Guidance on internal process for requesting services from vendors

g. Identifying the process and considerations the Department will use to work with community-based organizations (CBOs) acting as vendors and/or partners, if any, to provide meaningful access for ELL constituents.

h. Language access emergency response: provide any Department tools or processes to be used in providing language access in emergency response efforts.

10. Complaint Process: including any differences and nuances in relation to the complaint process outlined in the LAP.

11. Staff Training: identifying trainings Department staff has undergone and a proposal for provision of language access staff training for the next two years.

12. Tracking of Language Services: including any department specific tools or processes being implemented for the purpose of tracking.

13. Internal Evaluation and Assessment for Department Language Access Plan

14. Annual Reporting

   a. Internal Department process for efficient and accurate reporting

15. Appendix

   a. Any relevant resource for Department Language Access Plan implementation
Appendix D

City of Los Angeles
Citywide and Department Language Access Plan Updates & Reporting Timeline

Year 1: FY 22-23

● June 30, 2022: Citywide LAP finalized by Mayor Garcetti’s Office of Immigrant Affairs for FY 22-24

[FY 22-23 begins]

● March 30, 2023 (90 days prior to start of fiscal year): First Department Language Access Plan under ED 32 due to Coordinator
  ■ To give Department’s at least a year to review, understand, and draft their Language Access Plan
  ■ Coordinator will review, provide feedback and technical assistance

● June 30, 2023: Department LAPs are finalized with Coordinator feedback integrated, to go into effect July 1, 2023

[FY 23-24 begins]

Year 2: FY 23-24

● July 1, 2023 to June 30, 2024: Departments begin implementation phase

● August 30, 2023 (60 days after start of fiscal year): Departments submit annual Department Language Access Report to Coordinator

● October 30, 2023 (120 days after start of fiscal year): Coordinator submits annual Citywide Language Access Report to Mayor, City Council, and City Attorney to inform budget priorities

● July 1, 2023 - March 30, 2024 - Coordinator implements Community Input Mechanism

● June 30, 2024 - Biennial Citywide LAP update is finalized for FY 24-26

All proceeding years will adopt this same cycle of updates and reporting.